

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

INTERFOCUS INC., a California Corporation,

*Plaintiff,*

v.

Hangzhou Hibaby Technology Co., Ltd., and

Hibobi Technology Limited

*Defendants.*

Case No.: 1:22-cv-02259

Honorable Steven C. Seeger

**DECLARATION OF ZIYONG LI IN SUPPORT OF DEFENDANTS' RESPONSE TO  
PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION, TO EXPEDITE THE  
PRELIMINARY INJUNCTION HEARING, AND TO EXTEND THE OCTOBER 4, 2022  
TEMPORARY RESTRAINING ORDER**

I, Ziyong Li, declare and state as follows:

1. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.

2. I am a lawyer at Benesch Friedlander Coplan & Aronoff LLP.

3. Attached Exhibit P is a true and accurate copy of the email chain between Plaintiff counsel and Defendants counsel. Relevant portions have been highlighted.

4. I reviewed Plaintiff witness Robert Rosenblum's declaration and the attached Exhibits. Below is a true and accurate summary of the dates when each Hibobi website screenshot was captured based on the metadata printed on the exhibits.

Exhibit number of Hibobi website screenshot	Capture timestamp
Exhibit 1D	Thu, 20 Jan 2022 03:13:26 GMT Thu, 20 Jan 2022 03:13:44 GMT
Exhibit 2D	Thu, 20 Jan 2022 02:33:19 GMT
Exhibit 3D	Thu, 20 Jan 2022 02:36:08 GMT Thu, 20 Jan 2022 02:36:23 GMT Thu, 20 Jan 2022 02:36:49 GMT Thu, 20 Jan 2022 02:37:11 GMT
Exhibit 4D	Thu, 20 Jan 2022 03:03:23 GMT Thu, 20 Jan 2022 03:03:46 GMT Thu, 20 Jan 2022 03:04:06 GMT Thu, 20 Jan 2022 03:04:23 GMT Thu, 20 Jan 2022 03:06:19 GMT Thu, 20 Jan 2022 03:06:36 GMT Thu, 20 Jan 2022 03:06:56 GMT Thu, 20 Jan 2022 03:07:34 GMT Thu, 20 Jan 2022 03:07:52 GMT
Exhibit 5D	Thu, 20 Jan 2022 03:30:03 GMT
Exhibit 7D	Thu, 20 Jan 2022 03:24:21 GMT Thu, 20 Jan 2022 03:24:34 GMT Thu, 20 Jan 2022 03:24:51 GMT Thu, 20 Jan 2022 03:25:29 GMT
Exhibit 8D	Mon, 07 Mar 2022 20:13:16 GMT
Exhibit 9D	12/23/21, 11:28 AM
Exhibit 10D	12/23/21, 11:29 AM
Exhibit 11D	Mon, 28 Feb 2022 02:49:46 GMT Mon, 28 Feb 2022 02:50:22 GMT Mon, 28 Feb 2022 02:51:00 GMT Mon, 28 Feb 2022 02:49:31 GMT Mon, 28 Feb 2022 02:51:29 GMT

Exhibit number of Hibobi website screenshot	Capture timestamp
	Mon, 28 Feb 2022 02:51:45 GMT
Exhibit 12D	1/13/22, 4:32 PM
Exhibit 13D	Mon, 21 Mar 2022 07:05:50 GMT Mon, 21 Mar 2022 07:09:39 GMT Mon, 21 Mar 2022 07:14:28 GMT Mon, 21 Mar 2022 07:17:47 GMT Mon, 21 Mar 2022 07:19:09 GMT Mon, 21 Mar 2022 07:20:12 GMT
Exhibit 14D	Mon, 28 Feb 2022 03:55:18 GMT Mon, 28 Feb 2022 03:59:56 GMT Mon, 28 Feb 2022 03:55:48 GMT Mon, 28 Feb 2022 03:56:23 GMT Mon, 28 Feb 2022 03:57:24 GMT Mon, 28 Feb 2022 03:58:36 GMT Mon, 28 Feb 2022 03:58:49 GMT Mon, 28 Feb 2022 03:59:08 GMT Mon, 28 Feb 2022 03:59:23 GMT Mon, 28 Feb 2022 03:59:41 GMT
Exhibit 15D	Mon, 28 Feb 2022 03:22:06 GMT Mon, 28 Feb 2022 03:22:22 GMT Mon, 28 Feb 2022 03:22:38 GMT Mon, 28 Feb 2022 03:22:55 GMT Mon, 28 Feb 2022 03:23:31 GMT Mon, 28 Feb 2022 03:24:14 GMT
Exhibit 16D	Mon, 28 Feb 2022 03:24:28 GMT Mon, 28 Feb 2022 03:25:37 GMT Mon, 28 Feb 2022 03:26:59 GMT Mon, 28 Feb 2022 03:30:07 GMT
Exhibit 17D	Mon, 21 Mar 2022 07:30:43 GMT Mon, 21 Mar 2022 07:35:22 GMT Mon, 21 Mar 2022 07:36:00 GMT Mon, 21 Mar 2022 07:40:38 GMT Mon, 21 Mar 2022 07:44:30 GMT
Exhibit 18D	Fri, 25 Feb 2022 10:05:11 GMT Fri, 25 Feb 2022 10:05:31 GMT Fri, 25 Feb 2022 10:05:54 GMT Fri, 25 Feb 2022 10:06:46 GMT
Exhibit 19D	Fri, 25 Feb 2022 10:07:16 GMT
Exhibit 20D	Fri, 25 Feb 2022 10:08:19 GMT Fri, 25 Feb 2022 10:08:34 GMT Fri, 25 Feb 2022 10:08:50 GMT Fri, 25 Feb 2022 10:09:09 GMT
Exhibit 21D	Fri, 25 Feb 2022 10:09:30 GMT Fri, 25 Feb 2022 10:12:05 GMT Fri, 25 Feb 2022 10:12:20 GMT Fri, 25 Feb 2022 10:12:34 GMT
Exhibit 22D	Mon, 28 Feb 2022 02:52:20 GMT Mon, 28 Feb 2022 02:53:51 GMT Mon, 28 Feb 2022 02:54:06 GMT Mon, 28 Feb 2022 02:54:23 GMT Mon, 28 Feb 2022 02:56:57 GMT Mon, 28 Feb 2022 02:57:14 GMT
Exhibit 23D	Mon, 28 Feb 2022 02:55:11 GMT

Exhibit number of Hibobi website screenshot	Capture timestamp
	Mon, 28 Feb 2022 02:55:34 GMT Mon, 28 Feb 2022 02:56:08 GMT Mon, 28 Feb 2022 02:56:32 GMT
Exhibit 24D	Mon, 28 Feb 2022 03:40:58 GMT Mon, 28 Feb 2022 03:41:16 GMT Mon, 28 Feb 2022 03:50:03 GMT Mon, 28 Feb 2022 03:50:39 GMT Mon, 28 Feb 2022 03:53:42 GMT Mon, 28 Feb 2022 03:54:35 GMT
Exhibit 25D	Mon, 28 Feb 2022 03:50:57 GMT Mon, 28 Feb 2022 03:51:18 GMT Mon, 28 Feb 2022 03:51:54 GMT Mon, 28 Feb 2022 03:52:36 GMT
Exhibit 26D	Fri, 25 Feb 2022 09:47:47 GMT Fri, 25 Feb 2022 09:49:10 GMT Fri, 25 Feb 2022 09:53:11 GMT Fri, 25 Feb 2022 09:53:50 GMT Fri, 25 Feb 2022 09:54:32 GMT Fri, 25 Feb 2022 09:55:53 GMT Fri, 25 Feb 2022 09:56:57 GMT Fri, 25 Feb 2022 09:57:15 GMT Fri, 25 Feb 2022 09:58:40 GMT Fri, 25 Feb 2022 09:59:18 GMT
Exhibit 27D	Mon, 28 Feb 2022 02:13:34 GMT Mon, 28 Feb 2022 02:14:57 GMT Mon, 28 Feb 2022 02:34:31 GMT Mon, 28 Feb 2022 02:35:07 GMT Mon, 28 Feb 2022 02:35:41 GMT Mon, 28 Feb 2022 02:36:08 GMT Mon, 28 Feb 2022 02:36:51 GMT Mon, 28 Feb 2022 02:37:25 GMT
Exhibit 28D	Mon, 21 Mar 2022 07:45:50 GMT Mon, 21 Mar 2022 07:48:23 GMT Mon, 21 Mar 2022 07:48:59 GMT Mon, 21 Mar 2022 07:50:27 GMT Mon, 21 Mar 2022 07:51:03 GMT Mon, 21 Mar 2022 07:51:49 GMT
Exhibit 29D	Mon, 21 Mar 2022 07:53:42 GMT Mon, 21 Mar 2022 07:57:22 GMT Mon, 21 Mar 2022 07:58:43 GMT Mon, 21 Mar 2022 08:03:55 GMT Mon, 21 Mar 2022 08:04:17 GMT Wed, 23 Mar 2022 09:23:21 GMT
Exhibit 30D	Fri, 25 Feb 2022 10:14:20 GMT Fri, 25 Feb 2022 10:14:45 GMT Fri, 25 Feb 2022 10:15:03 GMT Fri, 25 Feb 2022 10:15:25 GMT
Exhibit 31D	Mon, 28 Feb 2022 02:03:38 GMT Mon, 28 Feb 2022 02:05:57 GMT Mon, 28 Feb 2022 02:06:59 GMT Mon, 28 Feb 2022 02:09:53 GMT Mon, 28 Feb 2022 02:10:19 GMT
Exhibit 32D	Mon, 21 Mar 2022 05:39:05 GMT

Exhibit number of Hibobi website screenshot	Capture timestamp
	Mon, 21 Mar 2022 05:44:33 GMT Mon, 21 Mar 2022 05:46:25 GMT Mon, 21 Mar 2022 05:47:14 GMT
Exhibit 33D	Mon, 28 Feb 2022 03:05:15 GMT Mon, 28 Feb 2022 03:05:42 GMT Mon, 28 Feb 2022 03:05:57 GMT
Exhibit 34D	Mon, 28 Feb 2022 03:06:37 GMT Mon, 28 Feb 2022 03:07:30 GMT Mon, 28 Feb 2022 03:07:53 GMT
Exhibit 35D	Mon, 28 Feb 2022 02:38:39 GMT Mon, 28 Feb 2022 02:39:36 GMT Mon, 28 Feb 2022 02:40:08 GMT Mon, 28 Feb 2022 02:40:51 GMT
Exhibit 36D	Fri, 25 Feb 2022 10:04:37 GMT
Exhibit 37D	Thu, 20 Jan 2022 03:26:41 GMT
Exhibit 39D	Thu, 20 Jan 2022 03:18:55 GMT
Exhibit 41D	Mon, 28 Feb 2022 03:10:32 GMT Mon, 28 Feb 2022 03:12:24 GMT
Exhibit 42D	Mon, 28 Feb 2022 03:12:39 GMT Mon, 28 Feb 2022 03:13:42 GMT Mon, 28 Feb 2022 03:20:55 GMT Mon, 28 Feb 2022 03:21:28 GMT
Exhibit 43D	Thu, 20 Jan 2022 07:03:04 GMT Thu, 20 Jan 2022 07:03:23 GMT Thu, 20 Jan 2022 07:03:43 GMT Thu, 20 Jan 2022 07:03:59 GMT Thu, 20 Jan 2022 07:04:19 GMT

5. Attached as Exhibit U is a true and accurate copy of Exhibits 4D and 8D attached to Robert Rosenblum's Declaration as Plaintiff served on Defendants.

6. Attached as Exhibit W is a true and accurate copy of the letter Plaintiff sent to Defendants in the attachment of the October 25, 2022 email.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 25, 2022, in California.

/s/ Ziyong Li

Ziyong Li